

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

**IN RE NII HOLDINGS, INC.
SECURITIES LITIGATION**

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) Civ. A. No. 1:14-cv-00227-LMB-JFA
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DEFENDANT NII HOLDINGS, INC.'S NOTICE OF SUGGESTION OF BANKRUPTCY

PLEASE TAKE NOTICE THAT on September 15, 2014 (the "Petition Date"), Defendant NII Holdings, Inc. ("NII Holdings") and eight of its direct and indirect subsidiaries (collectively, the "Debtors")¹ filed voluntary petitions for relief in the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court"), under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code"). The bankruptcy cases are jointly administered under Case No. 14-12611 (SCC) (S.D.N.Y.).

PLEASE TAKE FURTHER NOTICE THAT, in accordance with the automatic stay imposed by section 362 of the Bankruptcy Code, 11 U.S.C. § 362 (the "Automatic Stay"), no party may commence or prosecute any cause of action outside of the Bankruptcy Court either against NII Holdings and the other Debtors, or that would otherwise impact the Debtors or their property, without first obtaining an order from the Bankruptcy Court lifting the Automatic Stay for such specific purpose.

¹ The Debtors include the following entities, listed along with the last four digits of their respective taxpayer ID numbers in parentheses: NII Holdings, Inc. (1412); Nextel International (Services), Ltd. (6566); NII Capital Corp. (6843); NII Aviation, Inc. (6551); NII Funding Corp. (6265); NII Global Holdings, Inc. (1283); NII International Telecom S.C.A. (7498); NII International Holdings S.à r.l. (N/A); and NII International Services S.à r.l. (6081). The location of the Debtors' corporate headquarters and the Debtors' service address is 1875 Explorer Street, Suite 1000, Reston, VA 20190.

PLEASE TAKE FURTHER NOTICE THAT actions taken in violation of the Automatic Stay, and judgments entered or enforced against NII Holdings while the Automatic Stay is in effect, are void *ab initio* and without effect.

PLEASE TAKE FURTHER NOTICE THAT, in light of the foregoing, the instant case may not proceed or otherwise go forward with respect to NII Holdings or the other Debtors, or the Debtors' assets or liabilities, and NII Holdings may not take any further action during the pendency of the bankruptcy case to participate in the instant case.

PLEASE TAKE FURTHER NOTICE THAT NII Holdings expressly reserves all its rights with respect to the instant case, including, but not limited to, the right to move to vacate any judgment entered in the case as void.

Dated: September 18, 2014

Respectfully submitted,

/s/ Edwin L. Fountain

Edwin L. Fountain (Va. Bar No. 31918)

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Attorneys for Defendant NII Holdings, Inc.

CERTIFICATE OF SERVICE

I, Edwin L. Fountain, hereby certify that on this 18th day of September, 2014, I electronically filed this Defendant NII Holdings, Inc.'s Notice of Suggestion of Bankruptcy using the Court's CM/ECF system, and the Notice will be sent electronically to the registered participants.

/s/ Edwin L. Fountain

Edwin L. Fountain (Va. Bar No. 31918)

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